

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:)	Chapter 7
)	Case No. 18-04065
Cornelius Graves, III)	Hon. Carol A. Doyle
Mikki N. Graves,)	Hearing Date: Thurs., Feb. 28, 2019
)	@ 10:30 a.m.
Debtors.)	

NOTICE OF MOTION

To: See Attached Service List

PLEASE TAKE NOTICE that on **Thursday, February 28, 2019, at 10:30 a.m.**, or as soon thereafter as may be possible, we shall appear before the **Honorable Carol A. Doyle** or any other Judge sitting in her stead, in **Courtroom 742**, of the Dirksen Federal Building, 219 South Dearborn, in Chicago, Illinois, and shall then and there present the attached **Application of Trustee's Attorneys for the Allowance of Final Compensation and Reimbursement of Expenses**, a copy of which is hereby served upon you.

By: /s/Norman B. Newman
Norman B. Newman, Trustee for the bankruptcy
estate of Cornelius Graves, III and Mikki N. Graves

Norman B. Newman, ARDC No. 2045427
MUCH SHELIST, P.C.
191 North Wacker Drive, Suite 1800
Chicago, Illinois 60606
Telephone: 312.521.2000
Facsimile: 312.521.2100
nnewman@muchlaw.com

CERTIFICATE OF SERVICE

Norman B. Newman, an attorney, hereby certifies that on February 5, 2019, he electronically filed this Application for Compensation with the Clerk of the Court via the Court's CM/ECF system which will send electronic notification to those individual registered to receive notice.

/s/Norman B. Newman

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**APPLICATION OF TRUSTEE’S ATTORNEYS FOR THE ALLOWANCE OF FINAL
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Much Shelist, P.C. (“Much Shelist”), attorneys for Norman B. Newman, not individually but solely as the Chapter 7 Trustee herein, (the “Trustee”) moves this Court, pursuant to Section 330 of the Bankruptcy Code and Bankruptcy Rule 2016, for the allowance of final compensation and reimbursement of expenses for services rendered during the period March 27, 2018 through November 8, 2018. In support of this application, Much Shelist states as follows:

1. On February 14, 2018, Cornelius Graves, III and Mikki N. Graves (collectively, the “Debtors”) filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code. The Trustee was subsequently appointed interim trustee, qualified and continues to serve as Trustee in this case.

2. On April 5, 2018, this Court entered an Order authorizing the Trustee to employ Much Shelist as his attorneys in this case. This application includes legal services rendered by the Trustee. Mr. Newman has taken care to distinguish his legal services from his Trustee services. Attached hereto as Exhibit “A” is an itemization of Mr. Newman’s Trustee services. Much Shelist is not seeking compensation for the services identified on Exhibit “A” as part of this Application. Mr. Newman is filing a separate Application for Trustee Compensation.

3. Other than as permitted under Section 504 of the Bankruptcy Code, Much Shelist has no agreement with any person or firm whatsoever with regard to its compensation in this case. To date, Much Shelist has not received any compensation for services rendered as attorneys for the Trustee.

4 Much Shelist is entitled to receive final compensation in the amount of \$7,833.50 plus reimbursement of expenses in the amount of \$853.00 for services rendered during the period of March 27, 2018 through November 8, 2018.

5. Much Shelist provided 12.20 hours of services on behalf of the Trustee during the time period covered by this application.

6. The following is a summary of time expended, by individual, during the time period covered by this application.

Attorney	Hours Expended	Hourly Rate	Amount
Norman B. Newman	8.70 hrs.	\$655.00/hr.	\$5,698.50
Jeffrey M. Schwartz	3.50 hrs.	\$610.00/hr.	2,135.00
TOTAL	12.20 hrs.		\$7,833.50

7. Attached hereto as Exhibit "A" is a statement of legal services rendered. The services are listed chronologically and are separated by activity. The services were rendered in connection with and in furtherance of assisting the Trustee in the performance of his duties as delineated by §704 of the Bankruptcy Code. This application complies with the standards enunciated in *In re Continental Securities Litigation*, 572 F. Supp. 931 (N.D. Ill. 1983) modified 692 F.2d 766 (7th Cir. 1992).

8. At all times relevant hereto, Much Shelist provided legal services in the most efficient and cost effective manner. Much Shelist's goal was to obtain a positive resolution of the matter at hand, while in the process minimizing the costs to the estate.

A. Retention of Professionals (Tab No. 1): A total of 4.00 hours of time was expended by Much Shelist on the preparation of pleadings and appearance in Court on the Trustee's Motion to Employ Attorneys and on the Trustee's Motion to Employ Baret Arthur and the PPL Group ("PPL") as Auctioneers. Attorneys for the Trustee communicated telephonically and through written correspondence with PPL regarding revisions to their commission agreement and Mr. Arthur's affidavit.

The individuals who provided services in connection with this matter and the time expended by them are as follows:

Attorney	Hours	Rate	Total
Norman B. Newman	1.90 hrs.	\$655.00/hr.	\$1,244.50
Jeffrey M. Schwartz	2.10 hrs.	\$610.00/hr.	1,281.00
TOTAL	4.00 hrs.		\$2,525.50

B. Disposition of Assets (Tab No. 2): Much Shelist expended 4.80 hours in connection with the sale of two (2) motor vehicles. The only non-exempt assets in the Debtors' bankruptcy estate consists of two motor vehicles: 1) a 2013 Ford F150 Crew Cab Limited Pickup Truck (the "Pickup Truck"); and 2) a 2017 Chevrolet Corvette Convertible Stingray (the "Corvette"). Counsel corresponded with PPL regarding the auction sale of the Pickup Truck and the proceeds to be generated from same. Time was spent reviewing valuations and vehicle loan documents covering the Corvette and corresponding with Debtor's attorney regarding Debtor's offer to purchase the Trustee's interest in the Corvette. Much Shelist attorneys prepared pleadings to sell the Pickup Truck and discussed the timing of the auction itself with PPL. Time was also spent preparing pleadings and a Bill of Sale in connection with the sale of the Corvette back to the Debtor. After the auction sale, counsel assisted the Trustee with the preparation and

filing of a Report of Sale. The sale of the motor vehicles generated approximately \$26,000.00 for distribution to the creditors of this estate.

The individuals who provided services in connection with the Disposition of Assets and the time expended by them are as follows:

Attorney	Hours	Rate	Total
Norman B. Newman	3.40 hrs.	\$655.00/hr.	\$2,227.00
Jeffrey M. Schwartz	1.40 hrs.	610.00/hr.	854.00
TOTAL	4.80 hrs.		\$3,081.00

C. Claims Administration/Analysis (Tab No 3.): A total of 2.50 hours of time was spent reviewing the claims register and proofs of claim with respect to possible objections. Much Shelist reviewed six separate claims filed by the City of Chicago for water and sewer charges. Much Shelist communicated with counsel for the City of Chicago regarding the allowance of all six claims as unsecured claims for distribution purposes and reviewed the filed amended claims. Time was also spent communicating with the attorney for GSUPB Recovery Fund to discuss treating its 3.2 million secured claim as an allowed unsecured claim for the purposes of distribution. The individual who provided services in connection with the Administration of Claims and the time expended by him is as follows:

Attorney	Hours	Rate	Total
Norman B. Newman	2.50 hrs.	\$655.00/hr.	\$1,637.50
TOTAL	2.50 hrs.		\$1,637.50

D. Fee Matters (Tab No. 4): Much Shelist expended total of .90 hours of time dealing with the preparation and filing of this fee application. The individuals who provided services in connection with this matter and the time expended by him is as follows:

Attorney	Hours	Rate	Total
Norman B. Newman	.90 hrs.	\$655.00/hr.	\$589.50
TOTAL	.90 hrs.		\$589.50

9. During the time period covered by this Application, Much Shelist incurred out-of-pocket expenses in the amount of \$853.00. Attached hereto as Exhibit “B” is an itemization of Much Shelist’s out-of-pocket expenses. The charge for photocopies is 10¢ per page. Facsimile charges are billed at the rate of \$1.00 per page, incoming and outgoing. Much Shelist asserts that these out-of-pocket expenses were reasonable and necessary expenses incurred in its representation of the Trustee.

10. The services which Much Shelist provided as counsel for Trustee during the time period covered by this application were reasonable and necessary and resulted in a benefit to this estate and to the Trustee.

WHEREFORE, Much Shelist, P.C. respectfully requests that this Court enter an Order as follows:

1. Granting this Application and awarding Much Shelist final compensation in the amount of \$7,833.50 plus reimbursement of out-of-pocket expenses in the amount of \$853.00 for services rendered during the period March 27, 2018 through November8, 2018.

2. Authorizing the Trustee to pay Much Shelist the amount awarded forthwith as a Chapter 7 expense of administration of this estate; and

3. Granting such other and further relief as this Court deems just and appropriate.

Respectfully Submitted,

By: /s/Norman B. Newman
Norman B. Newman, Trustee for the bankruptcy
estate of Cornelius Graves, III and Mikki N. Graves

Norman B. Newman, ARDC No. 2045427

Much Shelist, P.C.

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COVER SHEET FOR APPLICATION FOR PROFESSIONAL SERVICES

Name of Applicant: Much Shelist, P.C.

Authorized to provide professional services to: Norman B. Newman, Chapter 7 Trustee

Date of Order Authorizing Employment: April 5, 2018

Period for which compensation is sought: March 27, 2018 through November 8, 2018

Amount of fees sought: \$7,833.50

Amount of expense reimbursement sought: \$853.00

Retainer previously received: \$0.00

This is a(n): Interim Application Final Application X

Prior fee applications:

Date Filed	Period Covered	Total Requested (Fees and Expenses)	Total Allowed	Any Amount Ordered Withheld
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The aggregate amount of fees and expenses *paid* to the Applicant to date for services rendered and expenses incurred herein is: \$0.00

Dated: 2/5/19

MUCH SHELIST, P.C.

By: /s/Norman B. Newman